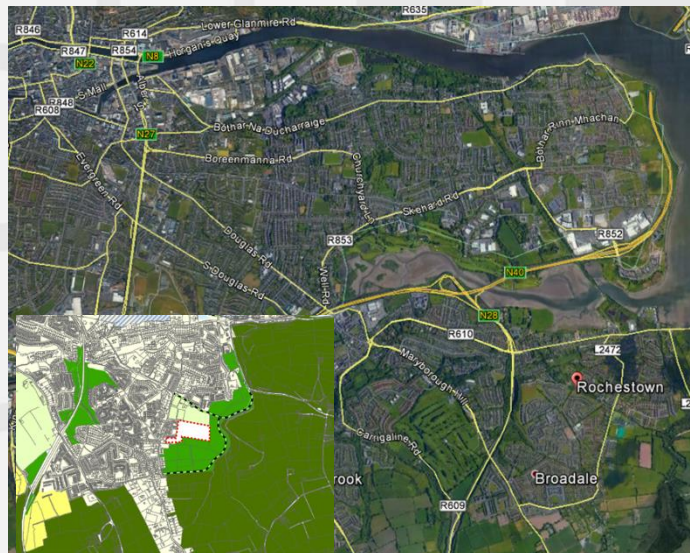


Submission to Draft Cork City Development Plan 2022-2028

Amendment to Zoning of South City Environs at
Garryduff, Rochestown

October 2021



McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

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CORK

6 Joyce House
Barrack Square
Ballincollig
Cork
P31 YX97

T. +353 (0)21 420 8710

DUBLIN

Kreston House
Arran Court
Arran Quay
Dublin 7
D07 K271

T. +353 (0)1 676 6971

www.mhplanning.ie

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1. Introduction

This submission has been prepared by McCutcheon Halley Chartered Planning Consultants on behalf of Clare Hennessy and Kay Hanley in response to public notices inviting submissions from third parties and interested parties on the Cork County Development Plan review in accordance with section 11(2)(bc) of the Planning and Development Act 2000.

Our client welcomes the publication of the Draft Cork City Development Plan 2022-2028 and the opportunity to participate in the plan making process which will inform the future development including the delivery of homes in the lifetime of the plan and beyond.

Our clients are the owners of 5.8ha of land (outlined in dashed red line below), which were previously identified as part of a Strategic Land Reserve (i.e. SLR 12) in the Ballincollig – Carrigaline Municipal District Local Area Plan 2017.

This submission requests that the previous commitment to strategic residential development by Cork County Council, be reinforced in the forthcoming City Development Plan (CDP) by introducing the following provisions for Rochestown:

- **Identify lands in Garyduff, Rochestown (previously identified as SLR 12) as ZO 03 Tier 3 Residential**



The remainder of this submission is structured as follows:

- Site Context
- Planning Policy
- Rationale for Submission Request
- Conclusion

2. Site Context

Our client's lands which measure approx. 5.8ha approximately, are located in Garyduff, Rochestown in the Southeastern Environs of Cork City. The site is located approx. 4km south of Douglas Village and approx. 7km south-east of Cork City Centre.

The Garyduff area has experienced significant growth in recent years due to its location and accessibility to major employment areas including the city centre and Ringaskiddy located approximately 6km south-west along the N28.

The subject site is located on gently sloping land and bounds established residential and residential amenity areas to the north and west.



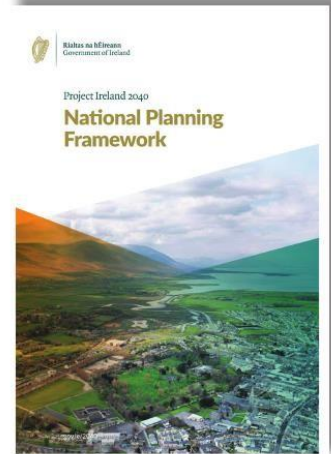
Figure 1. Site Location Aerial Image – site extent outlined in red inset

3. Planning Policy

3.1 National Planning Framework – Project Ireland 2040

In line with the recommendations set out in Rebuilding Ireland, the Government launched Ireland 2040, which comprises the National Planning Framework (NPF) and National Development Plan (NDP) 2018-2027. These plans aim to achieve balanced regional development by outlining a clear hierarchy for the urban centres outside the greater Dublin area, with Cork being promoted as the State's second city, fulfilling a nationally important role in counterbalancing the Capital.

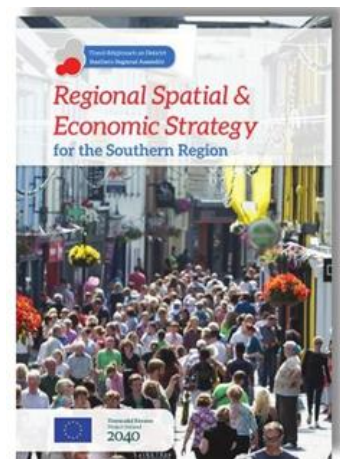
A core objective of the National Planning Framework is to build an average of 25,000–30,000 new homes annually to meet future planned needs of the population and deal with the demand-supply imbalance over recent years, in effect a doubling of annual housing output from 2016/2017 levels. According to the National Development Plan, Cork is expected to increase its population by 125,000 by 2040, which will require the provision of additional housing to accommodate 2,400 people every year up to 2040.



3.2 Regional Spatial & Economic Strategy (RSES) for the Southern Region

The RSES is a strategic document which provides the roadmap for effective regional development. The RSES identifies high-level requirements and policies for the Southern Region, setting out the high-level statutory framework to empower each local authority to develop CCDPs, Local Area Plans (LAPs) and LECPs that are coordinated with regional and national objectives.

Objective RPO 9 and 10 of the RSES states that it is an objective to ensure investment and delivery of comprehensive infrastructure packages to meet growth targets that prioritise the delivery of compact growth and sustainable mobility as per the NPF objectives including: Water services, digital, green infrastructure, transport and sustainable travel, community and social facilities and to achieve compact growth and infill sites, the RSES seeks to prioritise housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling.



3.3 Cork County Development Plan 2014

The site lies within the South Environs of Cork City. Objective CS 3-1 of the Cork County Development Plan (CDP) 2014 states that the strategic aim of the City Environs (North and South) is to:

"...grow its population to 20,000 as envisaged by the NSS. Develop as a major integrated employment centre so that it fulfils its role at regional and county level and should be a location of choice for most people especially those with an urban employment focus."

Section 2.2.15 of the Cork County Development Plan 2014 provides a context for the evidence-based analysis that points to the requirement to provide a Strategic Land Reserve in County Metropolitan Cork, including the fact Paragraph 4.2.11 of the SWRPGs gives support for provision of the following: *"an additional allowance for headroom, to allow for choice, sequencing and other local factors. This headroom should be calculated in line with the Development Plan Guidelines 2007"*. These 'Strategic Land Reserves' are being progressed further as part of the Local Area Plan process.

3.4 Ballincollig – Carrigaline Municipal District Local Area Plan 2017

In the 2017 Ballincollig – Carrigaline Municipal District Local Area Plan (LAP) the subject site forms part of the southern suburbs of Cork City. The current Local Area Plan (LAP) states that the strategic aim of the South Environs is as follows:

"...consolidation of the southern suburbs within the existing development boundary. The promotion of the suburban centres as important locations for residential, community and recreational facilities. Ensure the clear demarcation of the inner metropolitan greenbelt."

Policy SE-GO-01 establishes objectives for the quantum of development to be accommodated in the South Environs area over the plan period. It is an objective of the plan to:

"secure the development of 1,285 new dwellings in the South-Environs between 2017 and 2023."

The lands were also identified in the 2017 LAP as part of the 'Oldcourt Strategic Land Reserve' (SLR 12). The SLR's were identified by Cork County Council to take account of the housing projections set out in the Cork County Development Plan (CDP) 2014 and accordingly identified need for additional strategic land reserves in the order of 300-400 hectares of zoned residential land.

Following a high-level appraisal¹ a total of 12 no. SLR sites were identified with six of the SLR's including Oldcourt, being identified as the preferred SLR sites:

*"The High Level Appraisal has resulted in the emergence of 6 no. SLR sites at this stage (SLR3 Castletreasure, SLR4 Frankfield/Grange, SLR5 Togher/Doughcloyne, SLR6 Ardrostig, SLR7 Ballincollig East---Carrigrohane, **SLR12 Oldcourt**) as potentially having greater capacity to deliver. However, as all sites have matters to be considered in detail, it is recognised that detailed assessment is required, including consultation with landowners and state agencies. On this basis it is proposed to retain all the original 12 no. SLR sites for further detailed assessment, before preparation of site appraisals and development briefs for consideration by Development Committee. The assessment will include Habitats Directive Assessment and Strategic Environmental Assessment so that full account is taken of environmental and ecological issues."*

The High-Level Appraisal was based on the following criteria:

- 1) Sequential Approach: Selecting sites based on the principle that potential green---belt development should, where deemed appropriate, be located in the immediate environs of Cork City in the first instance;
- 2) Infrastructural Investment: Where sites offer opportunities to leverage maximum returns from infrastructural development but which would not prejudice the delivery of, or necessitate upfront investment which may be considered, regional or national in scale; and
- 3) Multi---modal Transport Opportunities: Located so as to offer potential multi-modal opportunities for accessing local trip generating services, existing/proposed public transport services and strategic employment areas.

The 12 no. SLR sites, including SLR 12 in Oldcourt/Rochestown, are identified in Figure 2.

¹

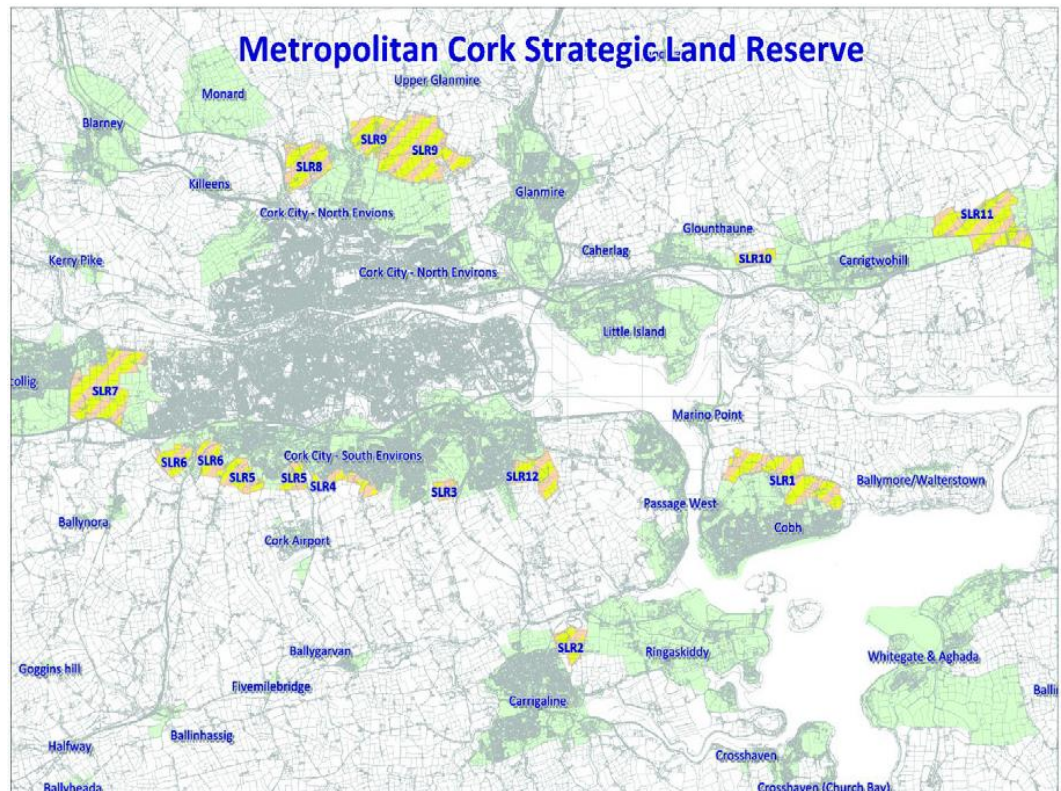


Figure 2: Extract from Figure 1.3 from the 2017 Ballincollig – Carrigaline Municipal District LAP.

Before the City boundary extension, Cork County Council were progressing the SLR process and wrote to the landowners within the SLR areas in 2018 seeking confirmation that they are willing to engage with the Council in relation to the SLR process and that in the event of their lands being zoned for residential use that they are aware of the provisions of the Urban Regeneration and Housing Act 2015 and the obligations in relation to the Vacant Site Levy applicable to all vacant residentially zoned lands – this was to emphasise the fact that the purpose of the SLR process is to deliver housing and to get an indication that landowners/developers would make land available for development on foot of any residential zoning adopted by the Council.

A follow up letter by the Council issued to landowners in April 2018, stated that following the Council's completion of its internal appraisal of each study area, they are engaging with external infrastructure providers and state agencies in order to advance the appraisal process. On completion of this stage of the appraisal in July 2018, the (County) Council would then review the appropriate next steps and would revert to each landowner to progress the SLR process.

3.5 Cork City Draft Development Plan 2022-2028

In the Cork City Draft Development Plan 2022-2028, our clients' lands are zoned "ZO 16 Public Open Space", where it is an objective to protect, retain and provide for passive and active recreational uses, open space, green networks, natural areas and amenity facilities.

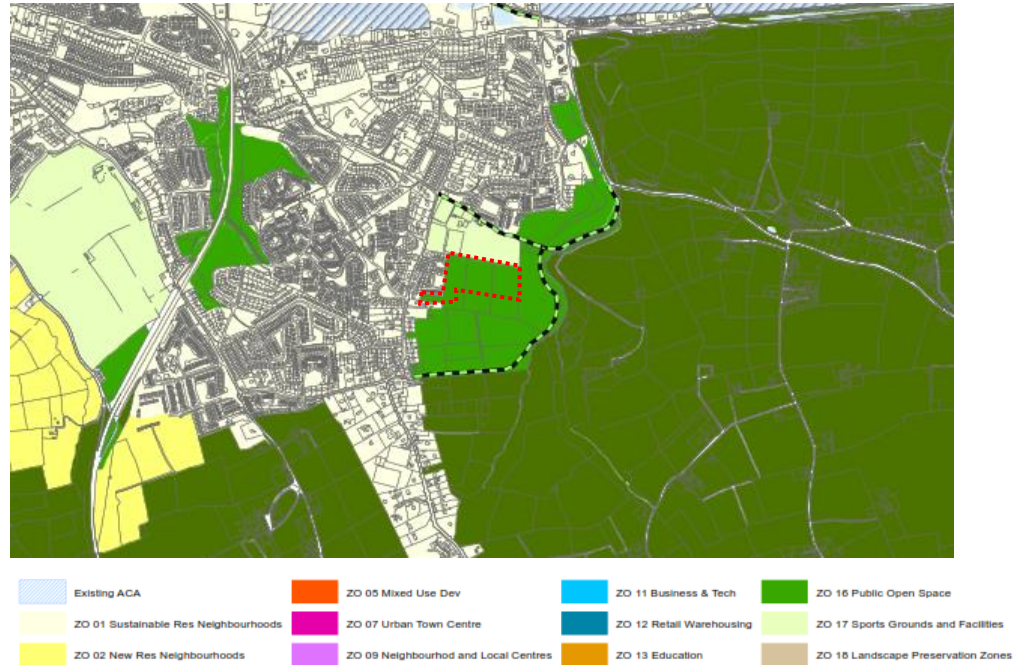


Figure 3: Extract of Zoning Map under Draft Plan

The draft CDP also identifies a new Tier 3 Residential Lands zoned as "ZO 3 Tier 3 Residential Neighbourhoods" (as shown in light yellow below in Figure 4) have the following objective: *"Zoning Objective 3: To provide for new residential development in the long term, in tandem with the provision of the necessary social and physical infrastructure."* This zone covers primarily greenfield, undeveloped lands for new sustainable residential areas, mainly deliverable in the longer term.

The Growth Strategy Map and Table set out in Figure 2.21 and Table 2.3 of the draft CDP, provides site level detail of the growth allocations set out in the Core Strategy. As can be seen from Figure 4 below, our clients lands are identified as part of an area identified for 'Compact Growth' where it is the City Council's strategic vision to:

"Integrate land-use and transport planning to achieve a compact city with 50% of all new homes delivered within the existing built-up footprint of the City on regenerated brownfield, infill and greenfield sites identified in the Core Strategy, and to achieve higher population densities aligned with strategic infrastructure delivery."

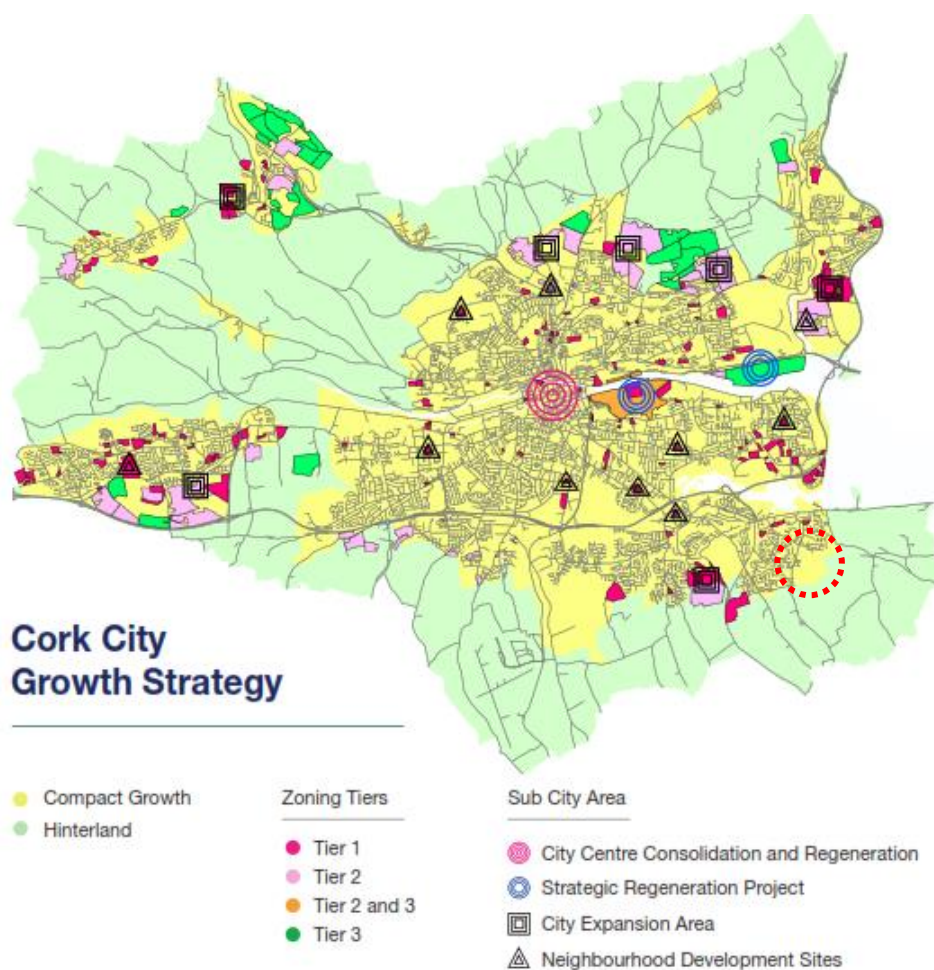


Figure 4: Extract from Figure 2.21 (Growth Strategy Map) from the draft CDP

3.6 Cork Metropolitan Area Transport Strategy 2040

The Cork Metropolitan Area Transport Strategy (CMATS) 2040 was developed by the National Transport Authority (NTA) in collaboration with Transport Infrastructure Ireland (TII), Cork City Council and Cork County Council.

CMATS represents a coordinated land use and transport strategy for the Cork Metropolitan Area to cover the period up to 2040. It takes its lead from the NPF 2040 and the National Development Plan (NDP) 2018-2027 which envisages that Cork will become the fastest-growing city region in Ireland with a projected 50% to 60% increase of its population by 2040.

The Strategy provides a coherent transport planning policy framework and implementation plan to support the planning authorities land use zonings and to help promote higher densities along transport corridors. As part of the strategy a series of 'Bus Connects' corridors are proposed where existing transport corridors will be upgraded to provide priority for public bus services, including dedicated bus lanes. As can be seen from Figure 3, dedicated bus connects corridors are proposed along Maryborough Hill and Clarkes Hill/Moneygourney Road.

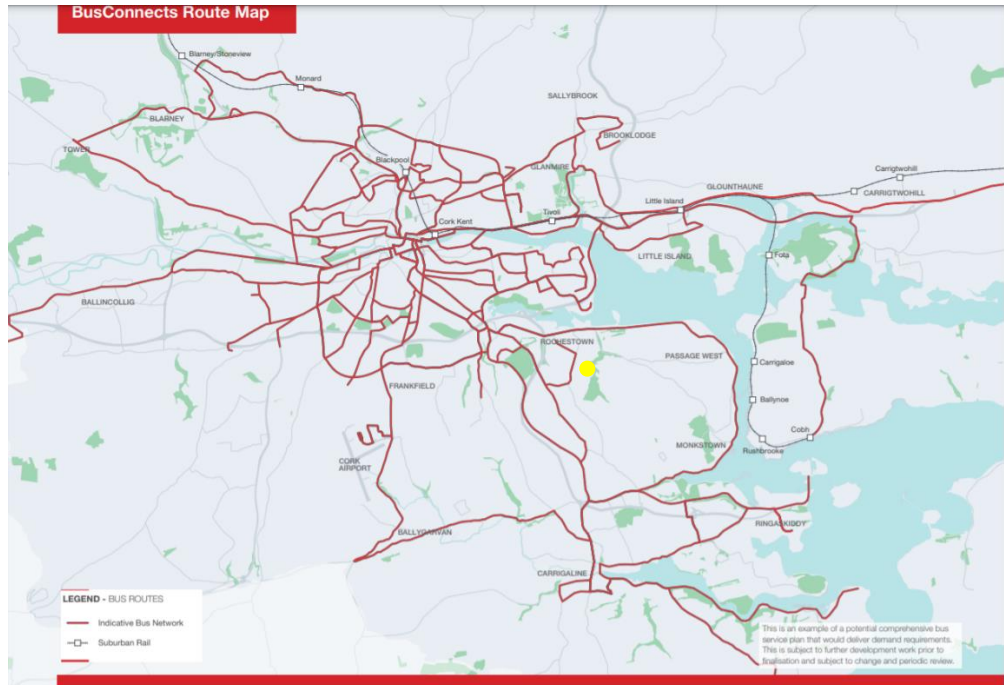


Figure 5: Extract of CMATS Bus Routes – site indicated as yellow dot

In addition to Busconnects, the Ballybrack Valley Greenway (Route Code: CSE-GW4) is a proposed new Greenway route linking from Domans Wood, across the north of Donnybrook Commercial centre, crossing the R851 and travels along the south west boundary of the Rochestown Golf Club before connecting with a future Inter-urban route on the N28. The route links in with phase 1 (constructed) and phase 2 (not yet constructed) of the Ballybrack Valley cycle route.

4. Rationale for Submission Request

Our client's lands comprise a logical and sustainable extension to the City and should be zoned ZO 03 Tier 3 Residential in line with Cork County Council's previous commitment to identify the area as a 'Strategic Land Reserve' (SLR 12) and the City Council's commitment towards 'Compact Growth'.

From a strategic perspective, the proposed zoning will provide for increased population growth in an area that is well served by existing infrastructure, community facilities and public transport linkages and will promote sustainable modes of transport. The proposed site represents a significant underutilised site which adjoins an existing residential area, in close proximity to Rochestown and Douglas.

The 216 bus service passes the estate Monfield which is in front of the site. This bus service is every 30 minute and within easy walking distance of the site. Another bus service passes the entrance to the land which serves Rochestown College.

The site is also within walking distance i.e. up to 10 minutes to high frequency public transport options on Moneygourney and Maryborough Hill (Bus Route 216, CUH to Mount Oval and Bus Route 220, Ballincollig to Carrigaline). The nearest high frequency bus service is located on Maryborough Hill, the 216-Route with a 30min frequency serving CUH and Mount Oval. The site is also within walking distance to the 220 servicing Ballincollig to Carrigaline via the City Centre with a frequency of 15mins.

The lands are located within close proximity to Foxwood, Mount Oval neighbourhood centre (1km) and Douglas Village (4km) which provide for social infrastructure facilities such as schools, shops, pharmacies, nursing home, crèche and sport clubs. All are accessible within a 15 min. walk from the site. The nearest primary school is Scoil Padraig Naofa which is directly across from the site entrance in Foxwood estate.

In relation to childcare and schools, there are 18 no. creches, 8 no. primary schools and 4 no. post-primary schools existing within close proximity to the site. In addition, a 24 classroom Educate Together primary school, located at Carr's Hill, approximately 1km from the subject site, has received planning permission (Cork County Council ref. 18/5369/ABP ref. 302924-18). The completion of this new school will lead to a capacity of 660 school places, an increase of 294 places on current the number of students in the existing Educate Together school, which will be relocated to the new site at Carr's Hill.



Figure 6: Primary and Post-Primary School Locations
(Garryduff site shown as yellow dot. Permitted Educate Together shown as a star)

The 8 no. primary and 4 no. post-primary schools located in the study area are all within a 10-20 minute travel time or 5 km radius of the proposed site.²

There is a total of 18 no. childcare facilities. The location of these facilities is outlined in Figure 7 below. These are also within a 10-20 minute travel time or 5 km radius of the proposed site.



Figure 7: Locations of Childcare Facilities

Other services/amenities in the area, includes Garryduff Sports Centre which is accommodating the temporary Educate Together School. Garryduff also provides training facilities to all local GAA clubs & schools in the area. Garryduff woods which has served a wide population for it's amenities, is also within easy walking distance to the site.

Overall, therefore the site is very well served by transport, infrastructure and community facilities and would provide a logical and sustainable extension to the City and should be zoned ZO 03 Tier 3 Residential.

² The total enrolment of primary school children in the 8 no. existing schools in the area is 3,660 pupils and this increases to 4,260 when the permitted Educate Together school is included. The total enrolment of post-primary schools in the 4 no. existing schools is 2,622 pupils.

5. Conclusion

This submission requests the following provisions in the forthcoming CDP for our clients lands in Garryduff, Rochestown:

- **Identify lands in Garryduff (previously identified as SLR 12) as ZO 03 Tier 3 Residential**



Figure 8: Proposed ZO 03 Residential Zoning at Garryduff (outlined in dashed red line)

We trust that our submission will be taken into account as part of the consultation process for the review of the Cork City Council Development Plan.

Please do not hesitate to contact us if you have any queries.

Yours sincerely,

Tom Halley



McCutcheon Halley